

Appl. No.: 09/923,389
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REMARKS

Claims 1-6 are pending in this application. Claim 1 is the only independent claim.

Reconsideration in view of the following remarks is respectfully solicited.

The Claims Define Patentable Subject Matter

The Office Action makes the following rejections:

(1) Claims 1-5 are rejected under 35 U.S.C. §103(a) as being unpatentable over European Patent No. EP 0 949 571 A2 by Bickmore (hereafter "Bickmore") in view of International Publication No. WO 00/39666 by Carlino et al. (hereafter "Carlino"); and

(2) Claim 6 is rejected under 35 U.S.C. §103(a) as being unpatentable over Bickmore in view of Carlino and further in view of Nokia 5110 telephone User's Guide.

The rejections are respectfully traversed.

Applicant respectfully submits that neither Bickmore nor Carlino, taken singularly or in combination (assuming these teachings may be combined, which Applicant does not admit) teach or suggest the claimed invention as presented herein. Furthermore,

Nokia fails to make up for the deficiencies found in both Bickmore and Carlino.

For example, in contrast with the present invention, Applicant respectfully submits that Bickmore merely discloses a system and method that re-authors a document originally designed to be displayed on a desktop computer screen for display on a smaller display screen. The Examiner alleges that Bickmore discloses a link extraction section for extracting the plurality of units of link information from the hypertext document. (see Office Action, page 3, 1st paragraph). Specifically, the Examiner directs our attention to Bickmore's page 7, paragraph 53 and page 16, paragraphs 131-133.

However, Applicant respectfully submits that a close review of these particular sections of Bickmore merely reveals that Bickmore is referring to the removal of images from documents if screen space is too limited or if the client device cannot display the images. Under such circumstances in Bickmore, the images are removed from the documents and the removed images are used as anchors for hypertext links via a client-side image map. In Bickmore, a transform extracts the hypertext links from the images

and formats them into a text list of link anchors. In other words, Bickmore's transformation merely preserves links attached to images for navigation when removing the images from the documents. (See Bickmore, paragraph [0053]).

In contrast with the present invention, Bickmore fails to be concerned with extracting a plurality of units of links from the document so as to make it easier to find a desired target link. Bickmore merely extracts links from removed images so that the HTML document is not rendered non-navigable. Furthermore, it appears that Bickmore fails to extract all links within the document, but instead only extracts the links from the removed images.

In addition, the Examiner alleges that Bickmore discloses a display section for displaying a list of the prescribed number of units of links information included in a specified group of a plurality of groups. (See Office Action, page 3, 2nd paragraph). The Examiner directs our attention to Bickmore's page 7, paragraph [0053], page 9, paragraph [0071] and Figs. 1-3.

However, a close review of these particular sections of Bickmore reveals that Bickmore fails to display a list of the prescribed number of units of link information included in a

specific group, because Bickmore fails to provide a plurality of groups of links. Bickmore merely takes an original document and converts it into a list of sections. As such, Bickmore's list in Fig. 1 is a list of sections found in the document, not a list of link information extracted from the document. Then, each section header in Bickmore's document is converted into a hypertext link to the original text block. (See Bickmore, paragraphs [0044-0045], and Fig. 1).

In other words, Bickmore takes the different sections in the document and puts them into a list, then the section headers are converted to hypertext links to the original document. As such, in Bickmore, when the hypertext link for any section is selected, the original text block containing that section is retrieved. However, Bickmore fails to take link information extracted from the document and place them into a plurality of groups containing a specified number of links and display a specific group, as set forth in claim 1. Instead, Bickmore takes text information and converts it into link information.

Furthermore, Bickmore fails to assign a code to each of the prescribed number of units of link information included in the

specific group. For example, in the present invention, the list is displayed in nine lines, each line including one of the numerical icons of "1" through "9". (See Fig. 4 in the present application). Bickmore merely discloses that each of the parse tree nodes are labeled with a unique identifier. (See Bickmore, paragraph [0067]). However, Bickmore's labeling with a unique identifier is a software label not a label/code which is displayed/assigned to a particular displayed link.

Furthermore, Bickmore fails to provide an input section used for inputting each code. Bickmore merely discloses parsing the HTML document and labeling each of the parse tree nodes with a unique identifier. (See Bickmore, paragraph [0067]). In other words, Bickmore's parsing is a computer program which breaks down the text into recognizable strings of characters. No input device is disclosed in Bickmore for inputting one of the assigned codes.

Apparently, it appears that the Examiner is inappropriately broadly interpreting Bickmore's "displaying on the browser" as reading on the claimed display section. Furthermore, it appears that the Examiner is also inappropriately relying heavily upon Bickmore's software manipulations to read upon the claimed

individual components, i.e., display section, input section. Applicant disagrees with the Examiner's above interpretation of Bickmore and submits that software manipulations are not equivalent to actual components. As noted above, Applicant submits that Bickmore fails to teach or suggest the claimed sections of the hypertext display apparatus and fails to be concerned with organizing the plurality of hypertext links within a document.

In an attempt to make up for the deficiencies found in Bickmore, the Examiner imports Carlino. The Examiner concedes that Bickmore fails to disclose classifying the plurality of units of link information into a plurality of groups so that each group includes a prescribed number of units of link information. (See Office Action, page 3, 6th paragraph). However, the Examiner alleges that Carlino discloses a classification section for classifying the plurality of units of link information. Applicant also disagrees with this allegation.

For example, Carlino discloses a system that divides and converts an original electronic document into multiple textual elements and non-textual elements. Specifically, Carlino divides an original electronic document into general categories of document

elements which were used to create an original electronic document (e.g., text, links, images, tables, etc.). The categories are displayed in a list that allows navigation to the individual categories.

However, Carlino fails to disclose classifying the link information into a plurality of groups so that each group includes a prescribed number of links. Carlino merely discloses categorizing the electronic document into categories, such as text, links, and tables. Then, Carlino lists each category individually. (see Carlino, Fig. 7). However, Carlino fails to classify the plurality of links, for example, into groups each having the same amount of links. Carlino merely lists the links separately from the text or images. Carlino fails to group the links into a plurality of groups and displaying a specific group. Carlino only shows a single list, not groups of lists.

Furthermore, Bickmore fails to disclose an input section having a button bearing the respective code assigned to each link information, as set forth in claim 3. The Examiner alleges that Figs. 1 and 2 of Bickmore discloses this feature. Applicant also disagrees with this allegation. For example, Bickmore's Figs. 1

and 2 merely disclose nested tables representing sub-pages. Absolutely no buttons showing the assigned code is displayed in Bickmore's Figs. 1 and 2.

As conceded by the Examiner, Bickmore fails to disclose classifying the links in groups. (See Office Action, page 3, 6th paragraph). As such, Bickmore cannot disclose taking such groups and arranging them in a prescribed order of display.

Applicant also submits that the Nokia 5110 User's Guide fails to make up for the deficiencies found in both Bickmore and Carlino noted above.

As such, Applicant submits that the claimed invention is distinguishable from the combination of cited art, Bickmore, Carlino and Nokia for at least the reasons noted above.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest

all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on Applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP 706.02(j).

Applicant respectfully submits that not only does the references fail to teach or suggest each and every feature as set forth in the claimed invention, but that one of ordinary skill in the art would not have been motivated to combine/modify the teachings of Bickmore with Carlino and Nokia because there is no teaching or suggestion in any of the references regarding how or why one would modify such systems to arrive at the claimed invention.

Applicant respectfully submits that independent claim 1 is allowable over the cited art for at least the reasons noted above.

As for each of the dependent claims not particularly discussed above, these claims are also allowable for at least the reasons set forth above regarding their corresponding independent claims, and/or for the further features claimed therein.

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Accordingly, withdrawal of the rejection of claims 1-6 under 35 U.S.C. §103(a) is respectfully requested.

Conclusion

In view of the foregoing, Applicant respectfully submits that the application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact Carolyn T. Baumgardner (Reg. No. 41,345) at (703) 205-8000 to schedule a Personal Interview.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment from or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §1.16 or under 37 C.F.R. §1.17; particularly, the extension of time fees.

Respectfully submitted,

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